



217/782-6761

Refer to: Johns-Manville Disposal Area, Waukegan, Illinois
Lake County/L0971900014
Superfund/Enforcement

December 18, 1986

Mr. Brad Bradley
Remedial Project Manager
CERCLA Enforcement Section
USEPA, Region V 5HE-12
230 South Dearborn Street
Chicago, Illinois 60604

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U.S. EPA
WASTE MANAGEMENT
ILLINOIS STATE DEPARTMENT (JPM)

Dear Brad:

This letter will serve to document the Agency's position on applicable or relevant and appropriate state standards, requirements, criteria or limitations (ARAR's) with specific reference to the Johns-Manville Disposal Area Superfund voluntary cleanup in Waukegan, Illinois.

As you are aware, the Federal Sites Management Unit has promoted the use of the draft general state design standards for closure of non-hazardous landfills which defines final cover quality and thickness (two foot of compacted suitable material) and is intended to limit the areal extent of groundwater degradation from the facility. The limited groundwater data collected by Manville's consultant during the remedial investigation (RI) did not reveal any contamination movement via this pathway. Based on this work, groundwater protection has been established as a secondary objective behind limitation of the upward mobility of asbestos from freeze/thaw action in the waste pile cap. To this end, we understand that USEPA is currently proposing a twenty-four inch thick compacted cap consisting of a base six inch lift of sand (none frost susceptible material), followed by fifteen inches of compacted local clayey soil, and finished with three inches of top soil to provide a rooting media for grassy vegetation.

This USEPA proposal would meet the state's cap thickness criteria (two foot minimum), but would not satisfy the clay composition criteria, which again, is intended to mitigate groundwater contamination. Given the fact that Manville has agreed to install and operate a detection groundwater monitoring system as approved by USEPA/IEPA, the state is in agreement with the proposed cap design developed specifically for this asbestos waste pile. However, the state expects a contingency plan to be included in the RD/RA order which would require the company to take corrective remedial action should significant groundwater contamination be confirmed from the detection monitoring system.

Finally, I wish to convey my management's position on oversight costs for this project. Since IEPA is not a party to the current administrative order, state funds have been expended in tracking the RI/FS. Our records show that



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approximately \$11,377.00 had been spent on personal services and travel as of September 30, 1986. There has been several meetings and review manhours spent in finalizing the FS and discussing the design of the selected alternative. Therefore, I believe that \$12,000.00 would represent an accurate total for past state oversight costs to be solicited from the company as part of the upcoming RD/RA order in which IEPA will be included. Additionally, this order should contain a mechanism by which future state, as well as USEPA costs, will be fairly reimbursed. Mr. Don Gimbel, the IEPA attorney for this project, will represent the Agency in these matters.

If you have any questions or require further clarification, please do not hesitate to contact me. I look forward to the next phase of this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt D. Neibergall", with a long, sweeping horizontal line extending to the right.

Kurt D. Neibergall, E.I.T.
Federal Site Management Unit
Remedial Project Management Section
Division of Land Pollution Control

KN:jab/1029g/59-60

cc: Jim Frank, IEPA
Bob Cowles, IEPA
Don Gimbel, IEPA
Gary King, IEPA
Division File